

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY)	
AVERAGE WHOLESALE PRICE)	MDL NO. 1456
LITIGATION)	
)	CIVIL ACTION: 01-CV-12257-PBS
THIS DOCUMENT RELATES TO:)	
ALL CLASS ACTIONS)	Judge Patti B. Saris
)	

**DEFENDANT GLAXOSMITHKLINE'S ASSENTED TO MOTION TO
ENLARGE TIME TO RESPOND TO PLAINTIFFS' MOTIONS TO COMPEL**

Defendant SmithKline Beecham Corporation d/b/a GlaxoSmithKline ("GSK") hereby moves, with plaintiffs' assent, to enlarge until April 1, 2005 the time to respond to the following motions filed by plaintiffs:

1. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Rule 30(b)(6) Witnesses, filed February 3, 2005.
2. Plaintiffs' Motion to Compel Defendant GlaxoSmithKline, Inc. to Produce Documents in the Manner Required by Rule 34(b), filed February 3, 2005.

With plaintiffs' assent, GSK moves to enlarge the time for response to both motions until April 1, 2005. The reason for this request is that GSK has identified a former GSK employee who may be qualified to serve as a 30(b)(6) witness for GSK under the notice at issue in the pending motion. GSK plans to interview the former employee on March 17, 2005 and, as soon as reasonably possible thereafter, either designate the former employee as a 30(b)(6) witness and provide a deposition date or provide another designee. GSK has also provided information, and expects to provide additional information, requested by plaintiffs that GSK expects will resolve the Rule 34(b) motion to compel. GSK believes that the issues raised by these motions can be resolved prior to the expiration of this enlargement.

WHEREFORE, for the foregoing reasons, GSK respectfully requests that this motion be granted.

Respectfully submitted,

By /s/ Geoffrey E. Hobart

Geoffrey E. Hobart
Mark D. Seltzer
Matthew J. O'Connor
Holland & Knight LLP
10 St. James Avenue
Boston, MA 02116
Telephone: (617) 523-2700
Facsimile: (617) 523-6850

Frederick G. Herold
Dechert LLP
975 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 813-4930
Facsimile: (650) 813-4848

Thomas H. Lee II
Dechert LLP
4000 Verizon Tower
1717 Arch Street
Philadelphia, PA 19103-2793
Telephone: (215) 994-2994
Facsimile: (215) 994-2222

Mark H. Lynch
Ethan M. Posner
Covington & Burling
1201 Pennsylvania Avenue
Washington, DC 20004
Telephone: (202) 662-6000
Facsimile: (202) 662-6291

*COUNSEL FOR
SMITHKLINE BEECHAM CORP.,
D/B/A GLAXOSMITHKLINE*

Dated: March 15, 2005

Assented to,

By /s/ David S. Nalven

Thomas M. Sobol
David S. Nalven
Edward Notargiacomo
Hagens Berman Sobol Shapiro LLP
One Main Street
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003

Steve W. Berman
Sean R. Matt
Hagens Berman Sobol Shapiro LLP
1301 Fifth Avenue, Suite 2900
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594

*LIAISON AND
CO-LEAD COUNSEL*

CERTIFICATE OF SERVICE

Docket No. MDL 1456

I, Geoffrey E. Hobart, hereby certify that I am one of GSK' attorneys and that, on March 15, 2005, I caused copies of Defendant GlaxoSmithKline's Assented-To Motion to Enlarge Time to Respond to Plaintiffs' Motions to Compel to be served via VeriLaw on all counsel of record.

/s/ Geoffrey E. Hobart

Dated: March 15, 2005

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